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Attorneys for Defendants
WELLS FARGO DEFENDANTS AND THE
INDIVIDUAL DEFENDANTS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GENERAL RETIREMENT SYSTEM OF
THE CITY OF DETROIT, Individually And
On Behalf Of All Others Similarly Situated,

Plaintiff,

v.

THE WELLS FARGO MORTGAGE
BACKED SECURITIES 2006-AR18
TRUST, THE WELLS FARGO
MORTGAGE BACKED SECURITIES 2006-
17 TRUST, THE WELLS FARGO
MORTGAGE BACKED SECURITIES 2006-
15 TRUST, THE WELLS FARGO
MORTGAGE BACKED SECURITIES 2006-
16 TRUST, THE WELLS FARGO
MORTGAGE BACKED SECURITIES 2006-
AR19 TRUST, THE WELLS FARGO
MORTGAGE BACKED SECURITIES 2006-
18 TRUST, THE WELLS FARGO
(Caption continued on next page)

Civil Case No. 09-1376-SI
(Consolidated with 09-CV-1620)

CONSOLIDATED CLASS ACTION ECF

**STIPULATION AND [PROPOSED]
ORDER REGARDING (1) CAPTION;
AND (2) BRIEFING SCHEDULE ON
MOTION TO DISMISS**

Judge: Hon. Susan Illston

1 MORTGAGE BACKED SECURITIES 2006-
 20 TRUST, THE WELLS FARGO
 2 MORTGAGE BACKED SECURITIES 2006-
 19 TRUST, THE WELLS FARGO
 3 MORTGAGE BACKED SECURITIES 2007-
 1 TRUST, THE WELLS FARGO
 4 ALTERNATIVE LOAN 2007-PA1 TRUST,
 5 THE WELLS FARGO MORTGAGE
 BACKED SECURITIES 2007-2 TRUST,
 6 THE WELLS FARGO MORTGAGE
 BACKED SECURITIES 2007-AR3 TRUST,
 7 THE WELLS FARGO MORTGAGE
 BACKED SECURITIES 2007-4 TRUST,
 8 THE WELLS FARGO MORTGAGE
 BACKED SECURITIES 2007-3 TRUST,
 9 THE WELLS FARGO MORTGAGE
 10 BACKED SECURITIES 2007-5 TRUST,
 11 THE WELLS FARGO MORTGAGE
 BACKED SECURITIES 2007-6 TRUST,
 12 THE WELLS FARGO MORTGAGE
 BACKED SECURITIES 2007-7 TRUST,
 13 THE WELLS FARGO MORTGAGE
 BACKED SECURITIES 2007-8 TRUST,
 14 THE WELLS FARGO MORTGAGE
 BACKED SECURITIES 2007-9 TRUST,
 15 THE WELLS FARGO MORTGAGE
 16 BACKED SECURITIES 2007-10 TRUST,
 17 THE WELLS FARGO MORTGAGE
 BACKED SECURITIES 2007-11 TRUST,
 18 THE WELLS FARGO MORTGAGE
 BACKED SECURITIES 2007-12 TRUST,
 19 WELLS FARGO ASSET SECURITIES
 CORPORATION, WELLS FARGO BANK,
 20 N.A., DAVID MOSKOWITZ, FRANKLIN
 CODEL, THOMAS NEARY, DOUGLAS K.
 21 JOHNSON, GOLDMAN, SACHS & CO.,
 JPMORGAN CHASE, INC., *as successor-in-*
 22 *interest to* BEAR, STEARNS & CO., INC.,
 23 HSBC SECURITIES (USA), INC.,
 DEUTSCHE BANK SECURITIES, INC.,
 24 UBS SECURITIES, LLC, CITIGROUP
 GLOBAL MARKETS, INC., GREENWICH
 25 CAPITAL MARKETS, INC.,
 BARCLAYS CAPITAL, INC., BANC OF
 26 AMERICA SECURITIES, LLC, BANK OF
 27
 28

(Caption continued on next page)

1 AMERICA CORPORATION *as successor-*
 2 *in-interest to* MERRILL LYNCH, PIERCE,
 3 FENNER & SMITH, INC., MOODY'S
 4 INVESTOR SERVICES, INC., THE
 MCGRAW-HILL COMPANIES AND
 FITCH RATINGS, INC.,

5 Defendants.

6
 7 WHEREAS, on March 27, 2009, the initial complaint was filed in the securities class
 8 action entitled *General Retirement System of the City of Detroit v. The Wells Fargo Mortgage*
 9 *Backed Securities 2006-AR18 Trust, et al.*, 09-CV-01376 (SI) ("Detroit Action");

10 WHEREAS, on April 13, 2009, the initial complaint was filed in the securities class action
 11 entitled *New Orleans Employees Retirement System, et al. v. Wells Fargo Asset Securities*
 12 *Corporation, et al.*, No. CV-09-01620 (SI) ("New Orleans Action");

13 WHEREAS, on June 1, 2009, Lead Plaintiffs (the Alameda County Employees'
 14 Retirement Association, the Government of Guam Retirement Fund, the New Orleans
 15 Employees' Retirement System and the Louisiana Sheriffs' Pension and Relief Fund) filed a
 16 motion to consolidate all related actions;

17 WHEREAS, on July 16, 2009, the Court, pursuant to Federal Rule of Civil Procedure
 18 42(a), consolidated the Detroit Action and the New Orleans Action and further ordered that the
 19 cases be consolidated under the lower case number, CV-09-01376 (SI);

20 WHEREAS, the parties agree that assigning a new caption to the case, as set forth below,
 21 will be more accurate for the consolidated action than continuing to use the caption of the first-
 22 filed case;

23 WHEREAS, on August 31, 2009, Lead Plaintiffs filed the Consolidated Class Action
 24 Complaint For Violations of §§ 11, 12(a)(2) And 15 Of The Securities Act Of 1933
 25 ("Complaint");

26 WHEREAS, Defendants intend to file motions to dismiss the Complaint;

27 WHEREAS, the parties met, conferred and agreed upon a schedule for resolving
 28 Defendants' motions to dismiss and advised the Court of that proposed schedule;

WHEREAS, six of the Defendants retained new counsel subsequent to the submission of that proposed briefing schedule, which counsel entered their first appearance on September 16, 2009;

WHEREAS, the Court issued an order on September 17, 2009, setting the hearing date for Defendants' motions to dismiss (and a Case Management Conference) for January 29, 2010, the date the parties had previously proposed;

WHEREAS, at the request of the newly appearing counsel, the parties have met, conferred and agreed to revise the previously negotiated schedule, but to retain the January 29, 2010 hearing date set by the Court;

THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned counsel for the parties herein, that:

1. The files of the consolidated action, and any subsequently consolidated actions, shall be maintained in one file under the Case No. CV-09-01376 (SI). Every pleading filed in the consolidated action shall bear the following caption:

IN RE WELLS FARGO MORTGAGE-
BACKED CERTIFICATES
LITIGATION

CIVIL ACTION NO. 09-01376 (SI)
CONSOLIDATED CLASS ACTION
ECF

2. The following briefing schedule shall apply to Defendants' motions to dismiss the Complaint:

- a. Defendants shall file and serve any motions to dismiss no later than October 30, 2009;
- b. Lead Plaintiffs shall file and serve their oppositions no later than December 15, 2009;
- c. Defendants shall file and serve any replies no later than January 15, 2010;

d. The hearing on the motions to dismiss will be set for January 29, 2010 at 9:00 a.m. and a Case Management Conference will be set for January 29, 2010 at 2:30 p.m.

Dated: October 5, 2009

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Lead Counsel for the Class

/s/ David R. Stickney
DAVID R. STICKNEY

Dated: October 5, 2009

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/s/ David H. Fry
DAVID H. FRY

*Attorneys for the Wells Fargo Defendants and the
Individual Defendants*

1 Dated: October 5, 2009

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7 /s/ Thomas O. Jacob

THOMAS O. JACOB

8 *Attorney for Wells Fargo Defendants*

9 Dated: October 5, 2009

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15 /s/ Bruce A. Ericson

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16 *Attorneys for the Underwriter Defendants*

17
18 Dated: October 5, 2009

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25 /s/ Stephanie J. Goldstein

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1 Dated: October 5, 2009

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/s/ David McCarthy

10 DAVID McCARTHY

11 *Attorneys for Defendant Moody's Investors Service,*
12 *Inc.*

13 Dated: October 5, 2009

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/s/ David T. Biderman

23 DAVID T. BIDERMAN

24 *Attorneys for Defendant*
25 *The McGraw-Hill Companies, Inc.*

1 Dated: October 5, 2009

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11 /s/ Jay Hines-Shah

12 JAY HINES-SHAH

13 *Attorneys for Defendant Fitch, Inc.*
14 *(d/b/a Fitch Ratings)*

15
16 Filer's Attestation: Pursuant to General Order No. 45, Section X(B), regarding signatures, I
17 attest under penalty of perjury that concurrence in the filing of the document has been obtained
18 from David R. Stickney, Bruce A. Ericson, David McCarthy, David T. Biderman, and Jay
19 Hines-Shah.

20 /s/

21 DAVID H. FRY

[PROPOSED] ORDER

In accordance with the parties' stipulation, it is hereby ORDERED that:

1. The files of the consolidated action, and any subsequently consolidated actions, shall be maintained in one file under the Case No. CV-09-01376 (SI). Every pleading filed in the consolidated action shall bear the following caption:

IN RE WELLS FARGO MORTGAGE-
BACKED CERTIFICATES LITIGATION

Civil Action No. 09-01376 (SI)

**CONSOLIDATED CLASS ACTION
ECF**

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- c. Defendants shall file and serve any replies no later than January 15, 2010;
- d. The hearing on the motions to dismiss will be set for January 29, 2010 at 9:00 a.m. and a Case Management Conference will be set for January 29, 2010 at 2:30 p.m.

IT IS SO ORDERED.

DATED: _____, 2009



THE HONORABLE SUSAN ILLSTON
United States District Court Judge

e.